

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

FOOD NOT BOMBS HOUSTON,]
BRANDON WALSH,]
Plaintiffs,]
] v.] C.A. No. 4:24-CV-338
] THE CITY OF HOUSTON, TEXAS,]
Defendant.]

ORAL AND VIDEOTAPED DEPOSITION OF

BRANDON WALSH

FEBRUARY 10, 2025

EXHIBIT

E

ORAL DEPOSITION OF BRANDON WALSH, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and numbered cause on the 10th of February, 2025, from 9:12 a.m. to 11:33 a.m., before Shawn Kelley, CSR No. 3448 in and for the State of Texas, by machine shorthand and computer-aided transcription, at 900 Bagby, 4th Floor, Houston, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Nell McCallum & Associates Inc. Houston (713) 861-0203

1 Q. Okay. Again, but my question is did -- did
2 anyone tell you -- did anyone from Food Not Bombs tell
3 you what the proper temperature of -- of the vegan food
4 should -- what the proper temperature of the vegan food
5 should be before you started serving it?

6 A. They've given me the same answer I'm giving you,
7 which is it's usually salad and rice and potatoes, and I
8 guess there's not a proper temperature, if that's what
9 you're looking for.

10 Q. Right, no, but I'm -- what I'm -- my specific
11 question is: Did anyone at Food Not Bombs tell you
12 that?

13 MR. HIROSHIGE: Objection, form.

14 MR. SOH:

15 Q. Did anyone at Food Not Bombs tell you what the
16 proper temperature of food, of any of the vegan food
17 that they served, should be?

18 A. Not off the top of my head.

19 Q. Okay. You mentioned chicken. Has Food Not Bombs
20 ever served fried chicken at the library?

21 A. No. It's --

22 Q. Okay.

23 A. -- a vegan and vegetarian organization.

24 Q. I'm just -- that was -- that has popped up in
25 some of the notes that we had. I just wanted to check

1 on that. Earlier you testified that you helped pick up
2 food and bring it to the downtown location.

3 A. Correct.

4 Q. Did you get any training from Food Not Bombs
5 Houston on the proper way to transport food?

6 A. Sure, the cooks would go out and show me how I
7 can secure it in my vehicle.

8 Q. The cooks meaning the people who prepared the
9 food?

10 A. Correct.

11 Q. Were they part of Food Not Bombs?

12 A. Correct.

13 Q. Okay. Did -- did you have -- have you ever seen
14 any -- has Food Not Bombs -- have you ever seen any
15 thermometers at feedings to help gauge the temperature
16 of the food that you're serving?

17 A. Not to my knowledge.

18 Q. Okay. Have you -- did -- did Food Not Bombs give
19 any of their servers formal training on proper food
20 safety measures?

21 MR. HIROSHIGE: Objection, form.

22 A. What would define as formal training?

23 MR. SOH:

24 Q. A presentation, a handout, pamphlet, anything
25 like that?

1 A. Food Not Bombs does have pamphlets on certain
2 topics that could include that. I'm not certain if we
3 actively have given one out recently.

4 Q. Do you recall ever seeing any of those given out?

5 A. Again, I don't speak for the whole group. I can
6 only speak from my experience. I personally have not
7 seen those pamphlets.

8 Q. Fair enough. And there are a -- and, obviously,
9 there are people at Food Not Bombs that are -- that
10 don't have the benefit of prior experience in the food
11 industry, correct?

12 MR. HIROSHIGE: Objection, form.

13 A. Food Not Bombs has a number of volunteers of
14 different skills.

15 MR. SOH:

16 Q. Right, but fair to -- I mean, you have some
17 experience with food -- with food service; is that
18 correct?

19 A. Correct.

20 Q. But it's fair to assume that there are people
21 that do not have that same background or experience as
22 you, correct?

23 A. Like I said, Food Not Bombs has a number of
24 volunteers. Some have food experience, some do not.

25 Q. Okay. That's all I -- all right. Next

1 paragraph, paragraph 7: Food Not Bombs Houston events
2 and my participation in them are a protest against the
3 City's treatment of unhoused people.

4 Further on you write: The city perpetuates the
5 very violence that puts unhoused people in their
6 disadvantaged situation by distributing food and raising
7 awareness of the violent treatment of unhoused people.
8 Food Not Bombs Houston protests the conditions that make
9 unhoused people live in such destitute conditions
10 without sufficient government support.

11 A. Who wrote this?

12 Q. I'm sorry. All right. Do you see that, sir? Do
13 you see that, what I just read to you?

14 A. Yeah.

15 Q. And that is paragraph 7 of your declaration. Do
16 you see that? If we go to page 6 of that --

17 A. Page 6?

18 Q. Page 6. You write: Pursuant to 28 U.S.C. 1746 I
19 declare under penalty of perjury that the foregoing is
20 true and correct.

21 And your signature is there, correct?

22 A. Okay.

23 Q. Do you see that?

24 A. Yes, sir.

25 Q. Does that clarify who wrote this?

1 A. Yes, sir, sorry, I'm very tired.

2 Q. Okay. If you want to take a break at any time,
3 just let me know. We can take a break?

4 A. I might need a five-minute, if that's okay. I
5 work nights.

6 Q. Sure. Take a break now?

7 A. Is that okay?

8 MR. HIROSHIGE: Sure.

9 MR. SOH: Yeah, sure.

10 THE WITNESS: Yeah?

11 VIDEOGRAPHER: Okay. The time is 9:44 a.m.

12 We're off the record.

13 [Recess]

14 VIDEOGRAPHER: The time is 10:04 a.m. We're now
15 back on the record.

16 MR. SOH:

17 Q. Mr. Walsh, as a -- as someone who is a member of
18 Food Not Bombs and instrumental in their social media
19 work, are you familiar with the Food Not Bombs Houston
20 website?

21 A. Uh-huh. Yes, sir.

22 Q. Did you -- do you upload content to that website?

23 A. No, sir.

24 Q. Okay. But you have some familiarity with it?

25 A. I know that we have a Houston-based website.

1 Q. Have you ever seen that website?

2 A. One time at best.

3 [Exhibit 11 marked, Food Not Bombs FAQs]

4 MR. SOH:

5 Q. Okay. Let me hand you what's been marked -- I'm
6 going to mark as Exhibit 11. This is something off the
7 Food Not Bombs -- okay. What I'll represent to you is
8 that the first page is the Food Not Bombs Houston
9 website, and there is a link about FAQs, frequently
10 asked questions, and then we printed out the frequently
11 asked questions, which I believe are the Food Not Bombs
12 national link, a link to the frequently asked questions
13 of the Food Not Bombs national website. All right? Do
14 you see that?

15 A. This is the -- the big Food Not Bombs website,
16 like not just Houston.

17 Q. I believe page 1 is Houston. If you look at the
18 top --

19 A. Yeah.

20 Q. -- it's Houston Food Not Bombs, and there's --
21 there's a link to frequently asked questions, and we
22 printed out the frequently asked questions page, and I
23 believe that is Food Not Bombs national, the frequently
24 asked questions. I'm just representing that to you. If
25 you disagree with me, please let me know.

1 A. I just wanted to understand.

2 Q. Yeah.

3 A. Thank you for clarifying.

4 Q. My questions are going to be on frequently asked
5 question 1, --

6 A. Uh-huh.

7 Q. -- when you get a second.

8 A. I'm ready when you are.

9 Q. Okay. It says: Does Food Not Bombs get its food
10 from dumpsters? To be clear, it says: Food Not Bombs
11 does not get food out of dumpsters.

12 But if you go down further, about four lines,
13 okay, it says in some cities the groceries and bakeries
14 are not willing to help, and we may seek some of our
15 food from dumpsters, but this is not generally the case.
16 Do you see that?

17 A. Yes, sir.

18 Q. Okay. No. 1, has Food Not Bombs Houston ever
19 gotten any food out of dumpsters?

20 A. No, sir, the groceries stores work with us.

21 It's --

22 Q. Okay.

23 A. -- very wonderful.

24 Q. Would you agree with me that getting food out of
25 dumpsters is not a good idea?

1 MR. HIROSHIGE: -- you're asking my client about
2 members whose identities have not been publicly
3 disclosed, then --

4 THE WITNESS: Yeah.

5 MR. HIROSHIGE: -- I would instruct my client not
6 to answer. But to the extent you're asking about
7 members who have been publicly disclosed, my client can
8 answer.

9 A. One of the representatives that I've actually
10 seen firsthand is Rebecca. She's gone and helped
11 mothers who have been in domestic violence situations.
12 I think last year there was one that was in -- like it
13 was in the cold area, and she had a lot of kids, and the
14 mother tried, you know, following what you're talking
15 about, getting no success, but Rebecca was able to
16 create a connection, from my understanding.

17 Q. Sure. Is there any formal programs that Food Not
18 Bombs Houston has to have -- that help homeless people
19 find housing?

20 A. I'm not currently aware.

21 Q. Okay.

22 A. I imagine there's a possibility, but as far as my
23 volunteeriness with Food Not Bombs, it does not include
24 that topic.

25 Q. Okay. So -- and you mentioned Rebecca and having

1 sort of an individualized assistance; is that correct?

2 MR. HIROSHIGE: Objection, mischaracterizes
3 testimony.

4 MR. SOH:

5 Q. Any other examples besides the Rebecca one that
6 you gave earlier?

7 A. No, sir.

8 Q. And you're not aware presently of any formal Food
9 Not Bombs Houston programs to provide housing assistance
10 to homeless people, correct?

11 A. I am at least not involved with them, if there
12 are any.

13 Q. Okay. But you don't know?

14 A. Yes, sir.

15 Q. Okay. Are there any formal programs at Food Not
16 Bombs Houston to assist people to get Medicare or
17 Medicaid or any other assistance through the Federal
18 government?

19 A. Again, sir, I only know what I know.

20 Q. Right.

21 A. And it's not that topic currently, sir.

22 Q. All right. But you don't -- you're not aware of
23 any?

24 A. Yes, sir.

25 Q. Okay.

1 A. I am not aware of any.

2 Q. All right. Are you aware of any people -- does
3 Food Not Bombs Houston have any services to provide
4 mental health assistance to the -- to the homeless
5 population?

6 A. I think we're getting confused on what Food Not
7 Bombs does.

8 Q. Okay.

9 A. Food Not Bombs serves food to people.

10 Q. I understand. I want -- but I want to know -- I
11 don't want to -- I'm not fussing with you. I'm just
12 trying to -- you're saying that the City doesn't do
13 enough in your declaration, and I just want to know
14 if -- you can have that opinion. I'm not going to hold
15 it to you. I also -- but if you're going to have that,
16 I want to know what Food Not Bombs does or doesn't do.

17 A. Food Not Bombs does the best to what they are
18 capable of, which is --

19 Q. Okay.

20 A. -- feeding people.

21 Q. Right. But I just want to make it clear that
22 they don't have resources -- other resources. Do you
23 see where I'm going with this?

24 A. Yes, sir.

25 Q. Okay. Does Food Not Bombs have any specific

1 programs designed to assist homeless people with mental
2 health issues or mental health disabilities?

3 A. I can't speak for the group on that. I'm not
4 sure. We might. I don't know.

5 Q. You're not aware of any?

6 A. No, sir, I'm not aware of any.

7 Q. Okay. Fair enough. Are you aware of any other
8 programs, formal programs, that Food Not Bombs Houston
9 has that would assist homeless people other than
10 feeding?

11 MR. HIROSHIGE: Objection, form, vague.

12 A. Again, I'm not aware, sir.

13 MR. SOH:

14 Q. Okay. Fair enough. In the last sentence you
15 write: By distributing food and raising awareness of
16 the violent treatment of unhoused people, Food Not Bombs
17 Houston protests the conditions that make unhoused
18 people live in such destitute conditions without
19 sufficient government support.

20 Do you see that?

21 A. Yes, sir.

22 Q. Okay. What do you mean by sufficient government
23 support?

24 A. I mean if someone has a health issue, it's very
25 rare that they're actually seen. You know, I feel that

1 sufficient support would be in the terms of, let's say,
2 somebody got injured, they would then get help. They
3 wouldn't have to wait and suffer.

4 Q. Has Food Not -- are you aware of Food Not Bombs
5 Houston doing anything to bridge this gap of a lack of
6 government support that you perceive?

7 MR. HIROSHIGE: Objection, form, vague.

8 A. Not currently aware, sir.

9 MR. SOH:

10 Q. All right. Paragraph 9, you said: Because of my
11 commitment to Food Not Bombs Houston's message, I intend
12 to engage in similar activities in the future.

13 You see that?

14 A. Yes, sir.

15 Q. My question to you is, is that if the Court were
16 to uphold the charitable feeding ordinance that's at
17 issue in this lawsuit, will you still feed at the
18 library?

19 A. Me personally?

20 Q. Yes.

21 A. In my future?

22 Q. Yes.

23 A. Only the future can tell, I suppose. If there's
24 a reason for why I might feed somewhere else in the
25 future, then there's that, but you're -- you're talking

1 about the future.

2 Q. Right. I mean, my question to you is that if the
3 charitable feeding ordinance is upheld, do you intend on
4 engaging in, let's say, civil disobedience and
5 continuing to feed at the library?

6 A. I'm not certain, sir.

7 Q. You don't know one way or the other?

8 A. No, sir.

9 Q. Okay. I'm going to show you what's been
10 previously marked as Exhibit 6. I'm sorry, I don't
11 have -- I don't have a specific copy of that. It's the
12 sign.

13 A. Oh, did they change the sign?

14 Q. I don't know. There's only one iteration of it,
15 as far as I know.

16 A. Is this at 61 Riesner, or is this at the library?

17 Q. Library. It's the same sign. So let me ask you
18 this. Exhibit 6, have you seen that before, sir?

19 A. They had a different one, I think. It was blue.

20 Q. Okay.

21 A. But, I mean, this is the -- the food ordinance
22 one, right?

23 Q. Let me ask you that. Do you know what that is?
24 Do you know what Exhibit 6 is?

25 A. It's -- it appears to be a health department sign

1 stating to comply with the regulation and -- for food
2 service, right?

3 Q. Did you see that before -- did you see that --
4 have you ever seen that sign before?

5 A. I don't think I've seen this specific sign. I
6 think they had a different sign at one point.

7 Q. Have you had a sign that said the same --

8 A. It is.

9 Q. Do you recall seeing a sign that --

10 A. Similar --

11 Q. -- had a similar message?

12 A. Yeah, similar message.

13 Q. Okay. And where was that sign that you saw?

14 A. I think that it's on one of the gates of the
15 library near --

16 Q. All right. And what is that sign giving you
17 notice of, sir?

18 MR. HIROSHIGE: Objection, calls for a legal
19 conclusion.

20 A. I mean, from my understanding the sign is -- is
21 just stating what the ordinance is.

22 MR. SOH:

23 Q. Right. I mean, you see the top, it says notice,
24 right?

25 A. Uh-huh.

1 Q. Is that correct?

2 A. Uh-huh.

3 Q. Is that a yes?

4 A. Yes, sir.

5 Q. Okay. All right. And it gives you the identity
6 of the ordinance, correct?

7 A. Yes, sir.

8 Q. All right. And that -- and it says if you do not
9 comply with the rules and regulations beyond 7 p.m. on
10 Friday, February 24th, 2023, you run the risk of
11 violating the law.

12 Do you see that?

13 A. I do see it, sir, yes.

14 Q. And so you saw this sign or something similar to
15 that when you were at the library, correct?

16 A. Which time?

17 Q. Any time before February 24th, 2023?

18 A. I haven't seen that specific sign before that
19 time. Like I said, I think it was a different sign.

20 Q. Okay. You saw -- fair to say you saw a sign
21 giving you notice about the charitable feeding
22 ordinance?

23 MR. HIROSHIGE: Objection, calls for a legal
24 conclusion.

25 A. Yes, sir. Is this the same one that Annise

1 Parker put in?

2 MR. SOH:

3 Q. No.

4 A. Okay. The ordinance, I mean.

5 Q. Let's -- I -- let's -- let me just go refocus you
6 on this question.

7 A. Yeah, sorry.

8 Q. Okay.

9 A. I needed to be on the same --

10 Q. No, no. Okay.

11 A. -- page with you.

12 Q. Sure. No, do you remember seeing this sign or a
13 sign similar to that in February of 2023?

14 A. I mean, they've had signs up, I imagine. I
15 haven't seen this specific sign, --

16 Q. Okay.

17 A. -- but I imagine.

18 Q. Do you recall ever seeing a sign warning you that
19 you may be in violation of law if you don't comply with
20 the charitable feeding ordinance?

21 A. I believe so, sir, yes.

22 Q. Okay. Fair enough. All right. Let's go back to
23 your declaration. Okay? Paragraph 11: I fear that I
24 will be criminalized under the anti-food sharing
25 ordinance because I participate in Food Not Bombs

1 Q. Okay. Have you seen -- at the conclusion of a
2 Food Not Bombs event, have you seen garbage collected
3 like this in areas near the library?

4 A. Define that question better, sir, I'm sorry.

5 Q. Sure. In the Food Not Bomb events that you've
6 participated in --

7 A. Uh-huh.

8 Q. -- have you seen garbage on the streets or the
9 sidewalk in a manner similarly depicted to Exhibit 12?
10 Have you ever seen that?

11 A. Not recently in my time, sir, I'm sorry.

12 Q. Ever?

13 A. I'm not certain of ever.

14 Q. Okay.

15 A. Do you know when this was taken?

16 Q. I think it was 2023. I can get the date later.
17 But have you -- my question is have you ever seen --
18 have you ever seen trash left after a Food Not Bombs
19 Houston feeding at the library?

20 A. Not -- not me personally, sir, I'm sorry.

21 Q. Is that acceptable to you, that -- the situation
22 depicted in Exhibit 12, is that acceptable to you?

23 A. I would personally, you know, strive for better,
24 for sure.

25 Q. Okay. And you would agree that it's not a good

1 MR. SOH: You want to take a break.

2 MR. HIROSHIGE: -- take a break?

3 MR. SOH: Yeah, sure, take break. I don't
4 have -- I've got maybe another hour.

5 MR. HIROSHIGE: I don't want to break --

6 MR. SOH: No.

7 MR. HIROSHIGE: -- if it --

8 MR. SOH: We're off.

9 VIDEOGRAPHER: The time is -- the time is
10 10:49 a.m. We're off the record.

11 [Recess]

12 VIDEOGRAPHER: The time is 11:07 a.m. We're now
13 back on the record.

14 MR. SOH:

15 Q. All right, Mr. Walsh, I only have about 15 or 20
16 more minutes of questions for you. So we'll be out of
17 here well before lunch. A couple quick questions. Have
18 you ever seen -- have you ever witnessed a fight during
19 a Food Not Bombs feeding event?

20 A. Like a physical altercation?

21 Q. Whatever you want to use, fight, whatever you
22 describe as a fight.

23 A. Sure, yes, sir.

24 Q. Okay. How many times?

25 A. Maybe once or twice.

1 Q. Okay. Did the police come in and separate the
2 people who are engaging in the fight?

3 A. No, sir.

4 Q. Okay. What happened?

5 A. Well, the people that we serve are our friends,
6 and we usually know these people, and the right people
7 will talk to them and, you know, dissolve the fight,
8 usually.

9 Q. Okay. Have you ever seen anyone at a Food Not
10 Bombs Houston event at the library urinate in public?

11 A. No, sir.

12 Q. Okay. Have you ever seen anyone in a Food Not
13 Bombs Houston event defecate during or after the event?

14 A. Not to my witness, sir.

15 Q. Okay. Have you ever -- have you seen Food Not --
16 the people who Food Not Bombs Houston serves grab bricks
17 or rocks off of the sidewalk and put them in line to
18 save their spot in line?

19 A. No, sir.

20 Q. Okay. How do people at Food Not Bombs Houston's
21 feeding events save their place in line?

22 A. We do a numbering system, sir.

23 Q. Okay. How? Explain that to me.

24 A. We'll have a bunch of premade numbers, one to
25 whatever, and they would then get their number on a

1 first come first serve basis. That holds their place in
2 line and ensures that if they -- you know, let's say
3 they need to sit down or want to -- maybe they've got a
4 later number, they're just going to relax until their
5 number gets called.

6 [Exhibit 14 marked, Order]

7 MR. SOH:

8 Q. Okay. I'm going to hand you what's marked
9 Exhibit 17. Judge Hanen's order isn't already in this
10 binder, is it?

11 A. Did we go past 14?

12 Q. No, wait, 14, sorry. I looked at the wrong --
13 lifted the wrong label.

14 A. Sorry.

15 MR. HIROSHIGE: I -- I don't believe it was.

16 MR. SOH:

17 Q. Okay. Let me show you --

18 A. What was the question?

19 Q. No, no, no question.

20 MR. HIROSHIGE: You're good, you're good. We're
21 just --

22 MR. SOH: All right.

23 MR. HIROSHIGE: -- figuring out numbers.

24 MR. SOH:

25 Q. We're just figuring it out.

1 A. Appreciate it.

2 Q. Handing you Exhibit 14, which I'll represent to
3 you is the order signed by Judge Hanen on February 14th,
4 2024. Okay?

5 A. Uh-huh. Yes, sir.

6 Q. Have you ever seen this before?

7 A. I've not physically held it, but I -- I'm aware
8 of it.

9 Q. Okay. Someone told you about it?

10 A. Yes, sir.

11 Q. Okay. My questions are going to be on page 14
12 and 15. So if you'd take a chance to look. Just read
13 it over when you get a chance. Okay?

14 A. The whole thing or 14 and --

15 Q. 14 --

16 A. -- 15?

17 Q. -- and 15.

18 A. Yes, sir.

19 Q. After IV where it says bond all the way through
20 the judge's signature. Take a -- take a second to read
21 it.

22 A. Yes, sir.

23 Q. Okay. We had a -- I asked you some previous
24 questions about the bond. So you're aware that there
25 was a bond that Food Not Bombs Houston had to pay,

1 correct?

2 A. Yes, sir.

3 Q. So let me ask you this question. The first
4 bullet point on page 15, it says Food Not Bombs Houston
5 are to and it says bring adequate trash receptacles to
6 the event, ensure that all waste and receptacles are
7 removed following the event.

8 Do you see that?

9 A. Yes, sir, I do.

10 Q. Do you have any problem with that, with doing
11 that?

12 MR. HIROSHIGE: Objection, form, vague.

13 A. For the \$2500 condition?

14 MR. SOH:

15 Q. Yeah.

16 A. I suppose not, sir.

17 Q. Is it -- is it a -- don't you think it's a good
18 idea if you're going to have a charitable feeding event
19 to bring trash receptacles and ensure that all waste and
20 receptacles are removed after the event?

21 A. I think that's a reasonable thing, sir, yeah.

22 Q. Okay. How about providing hand washing stations,
23 hand sanitizer and hand wipes to all attendees, is that
24 a reasonable condition for a charitable feeding event?

25 A. I think cleanliness is important, sir, and I

1 think that would be reasonable.

2 Q. Okay. You think it's reasonable to have people
3 avoid congregating on sidewalks and streets so as to
4 block a sidewalk and a street? Is that reasonable for a
5 charitable feeding event?

6 A. Within reason, sir, yeah.

7 Q. Okay. And do you think it's reasonable that all
8 food handling members attend a free virtual training on
9 food safety?

10 A. Sure, yes, sir.

11 Q. Have you ever attended the food safety training?

12 A. Not the free one, sir.

13 Q. Okay. You did some videos about going to 61
14 Riesner --

15 A. Yes, sir.

16 Q. -- and testing the porta potties. Do you
17 remember those?

18 A. Yes, sir, I do.

19 Q. Okay. We can play them for you if you'd like to,
20 but do you have a pretty good recollection of those
21 videos?

22 A. Yes, sir, I do.

23 Q. Okay. Is it -- is it your belief that those
24 porta potties should be open 24/7?

25 MR. HIROSHIGE: Objection, calls for a legal --

1

CHANGES AND SIGNATURE

2

DEPOSITION OF BRANDON WALSH, FEBRUARY 10, 2025

3

PAGE LINE CHANGE REASON

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Signature: _____ Date: _____

1 SIGNATURE OF WITNESS
23 I, BRANDON WALSH, have read the foregoing
4 transcript and hereby affix my signature that same is
5 true and correct, except as noted above.6 _____
7
8 BRANDON WALSH
910 THE STATE OF _____]
11 COUNTY OF _____]
1213 Before me, _____, on this day
14 personally appeared BRANDON WALSH, known to me (or
15 proved to me on the oath of _____ or
16 through _____ (description of
17 identity card or other document) to be the person whose
18 name is subscribed to the foregoing instrument and
19 acknowledged to me that they executed the same for the
20 purposes and consideration therein expressed.21 Given under my hand and seal of office this
22 _____ day of _____, _____.23 _____
24
25 NOTARY PUBLIC

FOOD NOT BOMBS HOUSTON,]
BRANDON WALSH,]
Plaintiffs,]
]]
v.] C.A. No. 4:24-CV-338
]]
THE CITY OF HOUSTON, TEXAS,]
Defendant.]

REPORTER'S CERTIFICATION

DEPOSITION OF BRANDON WALSH

FEBRUARY 10, 2025

12 I, Shawn Kelley, Certified Shorthand Reporter
13 No. 3448 in and for the State of Texas, hereby certify
14 to the following:

15 That the witness, BRANDON WALSH, was duly sworn
16 by the officer and that the transcript of the oral
17 deposition is a true record of the testimony given by
18 the witness;

19 That the deposition transcript was submitted on
20 _____, 2025, to Randall Hiroshige,
21 attorney for Plaintiffs, for examination, signature, and
22 return to the offices of Nell McCallum & Associates,
23 Inc., by _____, 2025.

24 That the amount of time used by each party at the
25 deposition is as follows:

1 Kenneth Soh - (1 hour, 32 minutes)

2 That pursuant to information given to the
3 deposition officer at the time said testimony was taken,
4 the following includes all parties of record:

5 Randall Hiroshige and Travis Fife, Attorneys for
6 the Plaintiffs Food Not Bombs Houston and Brandon Walsh

7 Randall Kallinen, Attorney for the Plaintiff
8 Phillip Picone

9 Kenneth Soh and Natoya Inglis, Attorneys for the
10 Defendant

11 I further certify that I am neither counsel for,
12 related to, nor employed by any of the parties in the
13 action in which this proceeding was taken, and further
14 that I am not financially or otherwise interested in the
15 outcome of the action.

16 Certified to by me this _____ day of _____,
17 2025.

18 
19

20 Shawn Kelley, Texas CSR No. 3448
21 Expiration Date: 1/31/24
22 Nell McCallum & Associates
23 Firm Registration No. 10095
24 Expiration Date: 1/31/25
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